

Debra Panos
Arbonne International
National Vice President, Independent Consultant

June 30, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580
RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am very appreciative and supportive of the FTC's role and responsibility to protect the public from "unfair and deceptive acts or practices". However, I am extremely concerned about proposed Business Opportunity Rule R511993 and the impact it will have on my business and the businesses of my network marketing colleagues.

The proposal, as written, will make it very difficult for me to continue to sell Arbonne products and to sponsor new consultants. I have built a solid business that I can look back on with pride. I am afraid that my business will suffer greatly as a result of the proposal.

The proposed 7-day waiting period to sign up new Consultants is of particular concern to me. We, at Arbonne, are very proud that the cost to sign up as a consultant and purchase an Arbonne Starter Kit is nominal and the risk associated with this purchase is minimal. Additionally, the new consultant has a three day cancellation period. My fear is that the 7 day waiting period will give the impression that perhaps there is a problem with Arbonne as a company and cause the prospect to lose confidence in the company and question Arbonne's integrity. Also, I will be required to maintain detailed records of my initial and follow up conversations which will be difficult to maintain and monitor.

It has been my experience that when a prospect decides to pursue Arbonne as a business the excitement, energy and enthusiasm are at their highest. To me, it is to the disadvantage of the new consultant to have to wait a full week before starting their business. This could have a serious and detrimental effect on my business and the business of the consultants that I introduce to the business.

The proposal includes calling for the release of any information regarding lawsuits involving misrepresentations, or unfair or deceptive practices. I feel that the foundation of my business has been built on an exceptionally high level of integrity and ethics. I am extremely proud of my business and feel that my business practices are always in the best interest of the consumer. As a result, I feel that being required to disclose any lawsuit involving Arbonne, whether or not there was any wrongdoing, will tarnish the business I have worked so diligently to create.

Lastly, the proposal requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. We encourage potential consultants to

meet and talk with existing consultants. As a matter of fact, we have weekly meetings designed just for this purpose. By sponsoring consultants with misleading information, I jeopardize the foundation of my business. They will eventually find out, be disappointed and angry that they have been misled and they will quit.

Additionally, I am not comfortable distributing personal information about another consultant without their knowledge or consent. Nor, would I want my own personal information disclosed with my knowledge or consent. I would certainly be wary of joining a company that advertised they would distribute my contact information to prospects.

I have been with Arbonne for about 2 ½ years. Prior to that, I was fortunate to have the opportunity to stay at home and raise my children for 15 years. When my husband and I decided that I would begin to contribute financially, we were looking for an opportunity that would allow me the flexibility to remain home with my children and to be available for them. I have three teenagers and I feel very strongly that, at this age, children need supervision more than ever. Also, my daughter started college last year and we would not have had the resources to send her to the school of her choice without my Arbonne business.

My husband has a very stressful job in the Telecom industry and he is very much comforted by the fact that if he were to lose his job, financially, we would survive.

I think the FTC performs an important and necessary role in protecting all of us. I am extremely concerned that the proposed rule will have a very negative impact on my business. I sincerely hope that the concerns that the FTC has can be resolved without detrimentally affecting my business and the businesses of my colleagues, in Arbonne and all other network marketing companies.

I appreciate your careful consideration.

Sincerely,

Debora Panos
Independent Consultant
Arbonne International